

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 01-34

REQUEST: WorldCom & AT&T Communications of New England, Inc., Set #1

DATED: October 17, 2001

ITEM: WCOM/ATT 1-1 For each report dimension and service disaggregation indicated in Instruction 13, state Verizon's annual revenues for special services from 1998 to the present.

REPLY: Verizon MA objects to this request on the grounds that it is overly broad and unduly burdensome and seeks information that is irrelevant, immaterial and beyond the scope of this proceeding. Verizon MA further objects on the grounds that the request is not reasonably calculated to lead to the discovery of admissible evidence because the revenue data sought is not relevant to assessing Verizon MA's intrastate special access service performance and the time period requested (*i.e.*, 1998 to present) exceeds the study period established by the Department in its March 14, 2001, Order and reflected in Verizon MA's Special Access Service reports filed on May 24, 2001, and September 7, 2001. Lastly, Verizon MA objects to providing information relating to its retail services, which are not at issue in this proceeding.

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ITEM: WCOM/ATT 1-2 For each report dimension and service disaggregation indicated in Instruction 13 and utilizing the time period specified in Instruction 9, state for each month the number of circuits (as defined in Instruction No. 14) ordered or requested from Verizon, excluding disconnects, Verizon test orders, Verizon administrative orders, and records only orders.

REPLY: Verizon MA objects to this request on the grounds that it is overly broad and unduly burdensome and seeks information that is irrelevant, immaterial and beyond the scope of this proceeding. Verizon MA further objects on the grounds that the information is not readily available in the form requested and would require that Verizon MA conduct special studies that would involve an extensive, time-consuming, dedicated work effort.

Verizon MA objects to the time period requested (*i.e.*, 1998 to present) because it exceeds the study period established by the Department in its March 14, 2001, Order and reflected in Verizon MA's Special Access Service reports filed on May 24, 2001, and September 7, 2001. Verizon MA also objects to this request on the grounds that it is not reasonably calculated to lead to the discovery of admissible evidence to the extent that it relates to Verizon's retail services, which are not at issue in this proceeding and not relevant to assessing Verizon MA's intrastate special access service performance.

Without waiving its objections, Verizon MA responds as follows

Due to circumstances beyond Verizon's control that occurred in New York on September 11, 2001, the historical records necessary to extract 2000 data for wholesale (special access) services are not

REPLY: WCOM/ATT 1-2
(cont'd)

readily available – and indeed may no longer exist at all on a mechanized basis. This is because the vast majority of those records resides in databases in Verizon's central office located at 140 West Street, New York in the immediate vicinity of "Ground Zero." For its retail (special) services, Verizon MA does not have access to historical records dating back to 1998 on a mechanized basis. If available, such data would only exist in archives and would require a considerable manual work effort to obtain.

The magnitude of the work involved to conduct special studies to produce information relating to Verizon MA's retail and wholesale services in the form requested is substantial. Data systems and computer programs must be retrieved from 140 West Street to conduct *any* work required for wholesale services. In addition, new computer programs would have to be written to obtain data for both retail and wholesale services to accommodate the request. Accordingly, in an effort to be responsive to this request, Verizon MA is willing to undertake the special studies required to provide the available data for wholesale and retail special services for 2001. Verizon MA's best estimate at this time is that it will take at least 3-4 weeks to complete all of the special studies for 2001.

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ITEM: WCOM/ATT 1-3 For each report dimension and service disaggregation indicated in Instruction 13 and utilizing the time period specified in Instruction 9, state the number of circuits (as defined in Instruction No. 14) that Verizon completed each month, excluding disconnects, Verizon test orders, Verizon administrative orders, and records only orders.

REPLY: See Verizon MA's Objection and Reply to WCOM/ATT 1-2.

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ITEM: WCOM/ATT 1-4 For each report dimension and service disaggregation indicated in Instruction 13 and utilizing the time period specified in Instruction n 9, state for each month the number of completed circuits (as defined in Instruction No. 14) given in response to WCOM/ATT-VZ 1-3 that were installed by the due date, excluding disconnects, Verizon test orders, Verizon administrative orders, and records only orders.

REPLY: See Verizon MA's Objection and Reply to WCOM/ATT 1-2.

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ITEM: WCOM/ATT 1-5 For each report dimension and service disaggregation indicated in Instruction 13 and utilizing the time period specified in Instruction 9, state for each month the number of completed circuits (as defined in Instruction No. 14) given in response to WCOM/ATT-VZ 1-3 that were not installed by the due date, excluding disconnects, Verizon test orders, Verizon administrative orders, and records only orders. Please state:

- (a) the number of completed circuits (as defined in Instruction No. 14) not installed by the due date for Verizon reasons, including but not limited to, lack of Verizon facilities, Verizon personnel, or other reasons for which Verizon was responsible;
- (b) the number of completed circuits (as defined in Instruction No. 14) not installed by the due date as a result of CNR.

REPLY: See Verizon MA's Objection and Reply to WCOM/ATT 1-2.

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ITEM: WCOM/ATT 1-6 For each report dimension and service disaggregation indicated in Instruction 13 and utilizing the time period specified in Instruction 9, as of the end of each month, provide the number of uncompleted circuits (as defined in Instruction No. 14) categorized by “age” (defined as the number of business days since an executable service request was received). Please exclude disconnects, Verizon test orders, Verizon administrative orders and records only orders. Provide age groups as follows: 1-5 days, 6-10 days, 11-20 days, 21-30 days, 31-40 days, and 40+ days.

REPLY: See Verizon MA’s Objection and Reply to WCOM/ATT 1-2.

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ITEM: WCOM/ATT 1-7 For each of your answers to Questions 5 and 6, and all broken-out subparts thereto, provide the ground(s) asserted by Verizon for failing to complete the order on the due date including, but not limited to:

- (a) lack of Verizon IOF facilities,
- (b) lack of Verizon OSP or Loop facilities;
- (c) lack of Verizon CO;
- (d) due to Verizon CPC, Verizon CATC, or Verizon Dispatch; and/or
- (e) other reasons for which Verizon was responsible; or
- (f) CNR.

REPLY: See Verizon MA's Objection and Reply to WCOM/ATT 1-2.

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ITEM: WCOM/ATT 1-14 For each report dimension and service disaggregation indicated in Instruction 13 and utilizing the time period specified in Instruction 9, state for each month the number of past due orders coded CNR, excluding disconnects, Verizon test orders, Verizon administrative orders, and records only orders.

REPLY: See Verizon MA's Objection and Reply to WCOM/ATT 1-2.

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ITEM: WCOM/ATT 1-18 For each report dimension and service disaggregation indicated in Instruction 13 and utilizing the time period specified in Instruction 9, state for each month:

- (a) the average installation interval; and
- (b) the average number of business days between the date on which an executable service request was received and the due date committed to by Verizon.

REPLY: See Verizon MA's Objection and Reply to WCOM/ATT 1-2.

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ITEM: WCOM/ATT 1-27 SBC Communications, Inc. ("SBC") and Verizon have stated that special access and private line services "belong in the same market" because both types of services "use the same facilities and are technically equivalent" and both "are provided by the same vendors to the same group of customers (predominantly large businesses)." See Comments of SBC and Verizon, at 13 n.32, *In the Matter of: Implementation of the Local Competition Provisions of the Telecommunications Act of 1996*, CC Docket 96-98 (dated April 5, 2001). State whether the Verizon agrees with each portion of this statement. Explain in detail the basis of your answer.

REPLY: The statements are taken from Verizon's response to the FCC's Public Notice in CC 96-98 seeking comment on whether it is appropriate to classify special access and private line services to the same market. Within that context, Verizon's position and supporting basis are stated in the complete footnote included below:

32 Public Notice at 2. The Public Notice also asks whether special access and private line services belong to the same market. Id. Such a classification is appropriate. Private line and special access services use the same facilities and are technically equivalent. They are provided by the same vendors to the same group of customers (predominantly large businesses). See Fact Report at 5 (noting that the Commission's local competition surveys, the leading independent study of the CLEC industry, and ALTS all treat private lines and special access services as a single category). The only difference (aside from the nominal points of

termination) is one of jurisdiction: private line services generally are offered out of the ILECs' state tariffs, while special access services are offered out of the FCC access tariffs.